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November 2, 2021

Via ECF

Honorable Vernon S. Broderick
United States District Court
40 Foley Square, Room 518
New York, New York 10007

**APPLICATION DENIED
SO ORDERED *Vernon S. Broderick***
VERNON S. BRODERICK
U.S.D.J. 11/3/2021.

This request is moot in light of my recent order.

Re: *Cortes et al. v. DS Brooklyn Portfolio Owner LLC et al.*
Civil Action No. 20-cv-09619

Your Honor:

We represent the plaintiffs, Joaquin Cortes and Raul Mera (“Plaintiffs”), in the above-captioned matter, and submit this letter to respectfully request a minor rescheduling of the telephonic hearing on Plaintiffs’ Motion for a Default Judgment Against Defendants DS Brooklyn Portfolio Owner LLC, DS 138 Ludlow LLC, Tier 1 Group LLC, Delshah Management, LLC, and Luis Feijoo currently scheduled for November 12, 2021 at 3:30 p.m.

Plaintiffs’ counsel are scheduled for a conference on another matter on November 12, 2021 at 3:00 p.m., and are unsure whether the 3:00 p.m. conference will have concluded by 3:30 p.m. We therefore respectfully request that the 3:30 p.m. November 12, 2021 conference be rescheduled to November 12, 2021 before 3:00 p.m. or after 4:00 p.m., or at a date and time to be set by the Court. This is Plaintiffs’ first request for an adjournment of this hearing. Defendants neither consent nor refuse to consent because they have not yet appeared in this matter.

We thank the Court for its consideration.

Respectfully submitted,



Nicola Ciliotta